

1 MELINDA HAAG (CABN 132612)
United States Attorney
2 THOMAS MOORE (ALBN 4305-O78T)
Chief, Tax Division
3 MICHAEL G. PITMAN (DCBN 484164)
Assistant United States Attorney, Tax Division
4 450 Golden Gate Ave., Box 36055
San Francisco, CA 94102
5 Telephone: (415) 436-6475
Facsimile: (415) 436-7009
6 Email: michael.pitman@usdoj.gov

7 Attorneys for the United States of America

8 UNITED STATES DISTRICT COURT

9 NORTHERN DISTRICT OF CALIFORNIA

10 SAN FRANCISCO DIVISION

11 Thomas R. Keane & Susan D. Keane,

Case No. 3:13-cv-05712-MEJ

12 Plaintiffs,

STIPULATION EXTENDING TIME TO
ANSWER OR OTHERWISE RESPOND
AND CONTINUING CASE
MANAGEMENT CONFERENCE AND
~~PROPOSED~~ ORDER

13 v.

14 United State of America,

15 Defendant.

16 IT IS HEREBY STIPULATED by and between Defendant the United States of America

17 ("United States") and Plaintiffs Thomas R. Keane and Susan D. Keane ("Plaintiffs"), by and

18 through undersigned counsel and pursuant to Fed. R. Civ. P. 16(b)(4) and Local Civil Rule 6-2,

19 that good cause exists and the parties request that the Court continue both the date for the United

20 States to answer or otherwise respond to Plaintiffs' Complaint, and the Case Management

21 Conference currently scheduled for April 24, 2014, by approximately 60 days, and state as

22 follows in support:

23 Plaintiffs commenced the instant action on or about December 10, 2013. The parties are

1 currently working to resolve the case without the Court's involvement, and anticipate that a
2 resolution will be reached that will result in dismissal of the Complaint.

3 Accordingly, the parties hereby stipulate that the United States shall have until May 23,
4 2014, to answer or otherwise respond to Plaintiffs' Complaint, and also that the Case
5 Management Conference currently scheduled for April 24, 2014, be continued until June 26,
6 2014 at 10:00 am. The requested extension is not being made for purposes of delay, but to allow
7 for the parties to continue settlement negotiations. The parties previously requested and received
8 two extensions in this matter.

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10 Respectfully submitted this 20th day of March, 2014,

11 MELINDA HAAG
United States Attorney

12 s/ Stephen J. Turanchik
13 STEPHEN J. TURANCHIK
Paul Hastings LLP
14 515 S, Flower Street
Los Angeles, CA 90071
213-683-6187
Fax: 213-996-3187
Email:
stephenturanchik@paulhastings.com

15 s/ Michael G. Pitman
MICHAEL G. PITMAN
Assistant United States Attorney, Tax Division
450 Golden Gate Ave., Box 36055
San Francisco, CA 94102
Telephone: (415) 436-6475
Facsimile: (415) 436-7009
Email: michael.pitman@usdoj.gov

16 Attorneys for the United States of America

17 Attorneys for Thomas R. Keane
and Susan D. Keane

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19 [PROPOSED] ORDER

20 Upon stipulation of the parties, and for good cause shown, it is hereby ORDERED that
21 the United States of America shall have until May 23, 2014, to answer or otherwise respond to
22 Plaintiffs' Complaint.

1 It is further ORDERED that the Case Management Conference currently scheduled for
2 April 24, 2014 is continued until June 26, 2014 at 10:00 am.

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4 SO ORDERED this 20th day of March, 2014.
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8 THE HONORABLE MARIA-ELENA JAMES
9 UNITED STATES MAGISTRATE JUDGE
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